effort costs imposed on me by responding to irrelevant prior art have a large impact on my limited resources.

3 My Claims Recite Specific Inventive Structures

Past office actions on other patent applications have rejected all my claims and made the argument that my claims read on some piece of irrelevant prior art. Other prior art is cited as pertinent, but is not used as justification for rejecting my claims.

I disagree with such office actions because my claims recite many novel inventive data structures and processes that are not shown by the prior art.

3.1 My claims recite specific inventive data structures in Wherein Clauses

My line of reasoning is typically as follows:

- My claims all contain "wherein" clauses that recite my inventive data structures.
- For example, one of my claims recites "wherein **collections** are data structures comprised of a **collection specifier** and **collection content** containing zero or more collection content files." Each of these special lexicographic terms is specially defined in the application, and is part of one or more inventive data structures that form part of my invention.
- Each wherein clause severely limits one of my claims to the specific inventive collection data structures described in my application.

The past office actions have never shows a convincing line of reasoning that suggests how a person of ordinary skill in the programming arts would be able to reach my inventive data structures and features by reading the cited prior art.

4 My Special Definitions and T rminology

This section shows that I act as my own lexicographer, and give special meaning to the keywords "collection" and derivative terms such as "collection specifier," "collection content," "collection type," "collection type definition," and "collection recognizer."

4.1 I act as my own lexicographer and define special meanings for key words.

As permitted by patent laws, I act as my own lexicographer and define special meanings for key words in the present application. My non-dictionary meanings of words such as "collection" are commonly misconstrued by patent examiners.

For example, Canadian patent examiners would often perform a simple text search of the prior art using the keyword "collection" to identify possible relevant prior art. However, the prior art found in this way always used the keyword "collection" for its normal dictionary meaning. As you can see, any irrelevant prior art patent might use the word "collection" in the dictionary way. Yet the Canadian examiners cited the found search results as relevant prior art anyway. This practice does not seem fair or proper to me, citing irrelevant prior art on the basis of a keyword search.

I respectfully request that USPTO examiners consider my special lexicographic definitions when they cite prior art against the present application. As one USPTO examiner told me, "responding to irrelevant prior art is a waste of time."

The following sections give **examples** of my special lexicographic definitions for "collection" words and phrases. My hope is that by listing them here, USPTO examiners will find it easier to compare my special meanings with normal dictionary meanings.

4.2 Definition of "collection"

From the application, "Collection is a term that refers to the union of a collection specifier and a set of collection content."

In essence, a collection is a software "container" (a software abstraction) that enables automated computer programs to "see, grasp, and manipulate" sets of related computer files.

Technically speaking, collections are inventive data structures whose existence is marked by a special file (collection specifier) that must associate itself with a specific user-defined set of rules (collection data type) for processing the collection. The processing rules are implemented in a special file (collection type definition) that is stored external to the collection, and that can be shared among all collections that associate themselves with that particular data type.

4.3 Definition of "collection specifier"

Collection specifiers contain information about a collection instance.

For example, collection specifiers may define such things as the collection type, a text summary description of the collection, collection content members, derivable output products, collection processing information such as process parallelism limits, special collection processing steps, and program option overrides for programs that manipulate collections.

Collection specifiers are typically implemented as simple key-value pairs in text files or database tables. FIG 3 shows an example physical representation of a collection specifier 102, implemented as a simple text file such as would be used on a typical personal computer filesystem.

From Page 18 of the application, "a collection specifier typically contains at least a collection type indicator FIG 8 Line 4 to link a collection instance to a collection type definition."

4.4 Definition of "collection content"

Collection content is the set of all files and directories that are members of the collection. By convention, all files and directories recursively located within an identified set of subtrees are usually considered to be collection members. In addition, collection

specifiers can contain collection content directives that add further files to the collection membership. Collection content is also called collection membership.

4.5 Definition of "collection type definition"

Collection type definitions are user-defined sets of attributes that can be shared among multiple collections. In practice, collection specifiers contain collection type indicators that reference detailed collection type definitions that are externally stored and shared among all collections of a particular type. Collection type definitions typically define such things as collection types, product types, file types, action types, administrative policy preferences, and other information that is useful to application programs for understanding and processing collections.

4.6 Definition of "collection information"

Collection information is a term that refers to the union of collection specifier information, collection type definition information, and collection content information.

Collection information is comprised of three major parts: (1) a collection specifier that contains information about a collection instance, (2) a collection type definition that contains information about how to process all collections of a particular type, and (3) optional collection content in the form of arbitrary computer files that belong to a collection.

4.7 My inventive collections are not part of the prior art

My inventive collection data structures, and the methods and apparatuses for processing collections, are the subject matter of several of my patent applications.

Since my applications are based on practical, novel, and non-obvious data structures that are not described in the prior art in any convincing way, my inventions do not read on the prior art.

5 Application Title and FIG Wording

Two past office actions have requested better titles for my inventions. I believe this happened because my titles contain the word "collection," which I use to mean my inventive data structures, which are a central part of my applications.

For an example, I have provided one of my responses below, to show the reasons why I think my use of the word "collection" in titles is appropriate, and how it supports the efforts of future text-searchers who want to find all instances of patent applications related to my inventive collection data structures, methods, and apparatuses.

5.1 Response to Title Objection

The office action claims that the present title "Collection Recognizer" is not indicative of the invention to which the claims are directed.

I disagree, and argue that the title is very indicative and precise for the subject matter that is being claimed.

The applicant carefully considered alternative title choices for the present invention and patent application, and came to the conclusion that "Collection Recognizer" best identified and represented the essence of both the invention and patent application document. No other title constructions seemed as good to the applicant.

In defense of the current title, there are only two words to consider.

"Collection" is a special lexical term that refers to the core inventive data structure underlying many of the applicant's patent pending applications. It is reasonable to give such an inventive data structure a representative name, and to carry that name into the titles of further inventions that work with the data structure, thereby distinguishing said inventions from other inventions that work with non-collection data structures.

"Recognizer" is a word that represents the essential operation of the present invention—which is a system and method for automatically recognizing inventive collection data structures within computer filesystems, with no human labor involved.

"Collection Recognizer" is also a special lexical term that refers to a method and system for recognizing inventive collection data structures *that are essential and relevant to the invention.* It is reasonable to put this term into the title of a patent application whose central function is to recognize collection data structures.

Finally, the presence of the word "Collection" in the title will help future prior art researchers to find patent applications that work with inventive collection data structures.

The applicant respectfully submits that the current title is a reasonable title because it both accurately and concisely reflects the essence of the present invention, as explained above.

Accordingly, the applicant respectfully requests withdrawal of the present objection.

5.2 Response to FIG Abbreviation Objection

The office action objects to my use of "FIG" for an abbreviation of "Figure," and states that appropriate correction is required.

The office action prefers to see "FIG." (with a following period) instead of the "FIG" which I have used.

I will comply with the office request if it is confirmed after this response. But I would like to explain why my use of "FIG" is reasonable in the context of today's computer and word processing technology.

Placing a period after "FIG." Confuses my Microsoft word processor in several ways.

- First, the presence of a period tells the word processor that an end of sentence has occurred. This causes the word processor to take actions appropriate to an end of sentence in the text.

- Second, the word processor inserts a larger than normal gap between FIG and the following number.